

EXHIBIT 8

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EPOCH EVERLASTING PLAY, LLC

and TARGET CORPORATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

WILLIENE JACKSON-JONES,
individually and on behalf of all others
situated, KAREN SANTOS, individually
and on behalf of all others situated,

Plaintiffs,

vs.

EPOCH EVERLASTING PLAY, LLC, a
Delaware limited liability company,
TARGET CORPORATION, a Minnesota
corporation, and AMAZON.COM
SERVICES LLC, a Delaware corporation,

Defendants.

Case No.: 2:23-cv-02567-ODW-SK

**DEFENDANT EPOCH
EVERLASTING PLAY, LLC'S
FIRST SUPPLEMENTAL
RESPONSES TO PLAINTIFFS'
INTERROGATORIES**

1 Defendant Epoch Everlasting Play, LLC (“EEP”), by and through its
2 undersigned counsel, hereby supplements its objections and responses to Plaintiffs’
3 Interrogatories as follows. EEP incorporates its General and Specific Objections to
4 Plaintiffs’ Interrogatories asserted on January 19, 2024. Subject to and without
5 waiving those objections, EEP states as follows:

6 Having conducted a reasonable search of its records, EEP hereby supplements
7 its responses to Plaintiffs’ Interrogatories Nos. 5 and 7 by attaching **Exhibit A**, which
8 shows sales data for all Calico Critters products containing a flocked figure that were
9 (a) sold and shipped by Calico Critters to consumers located in California, or (b) sold
10 by dropship retailers and shipped by EEP to consumers located in California
11 (including Target), between January 30, 2019 and December 31, 2023. EEP does not
12 concede that dropship sales would be relevant in calculating any potential restitution
13 award against EEP. Further, Exhibit A does not include sales by EEP to retailers in
14 California, as such sales are irrelevant where EEP does not know the identity or
15 location of any consumer purchasers of those products from the retailers.

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18 Dated: February 16, 2024

ARNOLD & PORTER KAYE SCHOLER LLP

19 By: /s/ James F. Speyer

20 James F. Speyer

21 Ian S. Hoffman

22 Attorneys for Defendants

23 EPOCH EVERLASTING PLAY, LLC and

24 TARGET CORPORATION
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2024, I served the foregoing document via e-mail, per agreement of the parties, on the following:

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Counsel for Plaintiffs and the Proposed Class

Dated: February 16, 2024

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By: /s/ Ian S. Hoffman

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EPOCH EVERLASTING PLAY, LLC and
TARGET CORPORATION